

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LOVE AND MADNESS, INC.,

Plaintiff,

v.

CLAIRE’S HOLDINGS LLC, et al.,

Defendants.

Civil Action No.: 1:21-cv-01913-AT-SLC

**MOTION TO FILE DOCUMENTS
UNDER SEAL**

TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS
OF RECORD:

Pursuant to the Court’s September 10, 2021 Order directing Doniger/Burroughs APC and Barton LLP to file certain financial information under seal (Dkt. #75), Plaintiff Love and Madness, Inc., by and through its undersigned attorneys, hereby moves to file the following documents under seal:

- Unredacted Supplemental Letter-Motion from Doniger/Burroughs APC;
- Unredacted Declaration of Laura M. Zaharia, Esq.;
- Unredacted Declaration of Heather McAvoy (“McAvoy Declaration”);
- Exhibit 1 to the McAvoy Declaration (an unredacted copy of all Barton LLP’s invoices to Heather McAvoy);
- Exhibit 2 to the McAvoy Declaration (an unredacted copy of Barton LLP’s invoices to Heather McAvoy pertaining to intellectual property matters);
- Exhibit 3 to the McAvoy Declaration (an unredacted copy of Barton LLP’s invoices to Heather McAvoy pertaining to a Social Security Administration matter); and
- Exhibit 4 to the McAvoy Declaration (unredacted screenshots reflecting Heather McAvoy’s liquid assets).

Complete copies of the foregoing documents have been submitted to Chambers and served upon Plaintiff's former counsel, Laura-Michelle Horgan and Maurice N. Ross of Barton LLP.

Respectfully submitted,

Dated: September 24, 2021

By: /s/ Scott Alan Burroughs
Scott Alan Burroughs, Esq.
Laura M. Zaharia, Esq.
DONIGER / BURROUGHS
247 Water Street, First Floor
New York, New York 10038
Telephone: (310) 590-1820
Counsel for Plaintiff Love and Madness,
Inc.